

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DR. DOUGLASS SCHOTTENSTEIN, M.D., THOMPSON  
REAL ESTATE, LLC, and SCHOTTENSTEIN PAIN  
AND NEURO, PLLC D/B/A NY SPINE MEDICINE,

22-cv-01197 (DLC)

Plaintiffs,

-against-

**DECLARATION IN**  
**OPPOSITION**

DEREK LEE, PEARL CHAN, and JOHN AND JANE  
DOES 1-10,

Defendants.

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**JEFFREY CHABROWE**, pursuant to 28 U.S.C. § 1746, hereby declares under penalty  
of perjury that the forgoing is true and correct as follows:

1. I am an attorney admitted to practice law in the Southern District of New York, and I represent the Defendants in this matter. As such, I am fully familiar with the facts and circumstances below.
2. I submit this Declaration on behalf of Defendants Derek Lee and Pearl Chan in support of their Opposition to Plaintiffs' Motion for Partial Summary Judgment.
3. Affidavit of Pearl Chan, **Exhibit A**.
4. Excerpts of Deposition Testimony of Pearl Chan, **Exhibit B**.
5. Affidavit of Derek Lee, **Exhibit C**.
6. Excerpts of Deposition Testimony of Derek Lee, **Exhibit D**.
7. JAMS Protective Order, **Exhibit E**.
8. Text Re. 700K, DEF-00226, **Exhibit F**.
9. Test Re. 550K, DEF-00215, **Exhibit G**.

10. Text Re. Amex Use, DEF-00133, **Exhibit H.**
11. Bank Statement Showing \$100k HIPPA Payment, DEF-00231, **Exhibit I.**
12. Schottenstein-Chan Cash Text, **DEF-00169, Exhibit J.**
13. February 6, 2020, Email, **Exhibit K.**
14. Defendants' Responses to Request for Admissions, **Exhibit L.**
15. Text Message, DEF-00213, **Exhibit M.**
16. Photos Sent by Schottenstein, **Exhibit N.**

Dated: New York, New York  
September 15, 2023

Respectfully Submitted,

The Law Office of Jeffrey Chabrowe, P.C.  
By:

\_\_\_\_\_/s\_\_\_\_\_  
Jeffrey Chabrowe, Esq.  
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